

**From:** [ANDERSON Jim M](#)  
**To:** [Eric Blischke/R10/USEPA/US@EPA](#); [Chip Humphrey/R10/USEPA/US@EPA](#)  
**Cc:** [PETERSON Jenn L](#); [POULSEN Mike](#); [MCCLINCY Matt](#); [GAINER Tom](#); [TARNOW Karen E](#)  
**Subject:** LWG's 2/6/09 "RI-FS Issues Status Table"  
**Date:** 03/05/2009 03:34 PM  
**Attachments:** [RE Data Use Rules JPDEQ comments.rtf](#)

---

Eric,

DEQ reviewed LWG's 2/6/09 "RI-FS Issue Status Table" & have several comments.

Issue #4, TZW Ecological Risk Assessment: Eric, Jennifer's not in today so I can't discuss this comment with her. I think the issue is resolved, & the LWG will **not** include isolation/shielding from TZW in the risk assessment, but will discuss isolation/shielding in the uncertainty section. However, I wanted to pass Jennifer's comment onto you for your consideration. Jennifer said..., *"It is unclear what is meant here by a resolution in determining risk to the benthic community from transition zone water. The isolation from contaminated water by benthic invertebrates and insects does not occur in all species, and it is questionable if and to what degree it may occur in oligochaete species (e.g. tubificid worms). It was my understanding that risk would be assessed by not adjusting exposure by assuming isolation in any way, but by comparing direct contact of undiluted pore water appropriate TRVs. However, this comment indicates that this comparison would only be a "screening step".*

Issue #7, Initial and Refined Eco Risk Screening Steps: The flowchart originally presented by the LWG on 4/14/08 interpreted the problem formulation *Refined Screen Procedure 2* as including a refined screen step that allowed a re-evaluation of the exposure point concentration for sediment for screening purposes. However, the text is not explicit that, like the frequency of detection screen, this would not apply to receptors where the appropriate EPC is a localized exposure concentration (e.g. max or EPC calculation localized sediment). The LWG interpreted this to mean they could calculate a site-wide 95% UCL on sediment concentrations and compare this value to benthic community (and other appropriate receptor) SLVs. However, at the meeting on May 15<sup>th</sup>, 2008, the problem with this approach was pointed out. Any calculation of an exposure point concentration would have to match up with the scale of the receptor, including the benthic community. This option would only be available to those receptors with large enough home-ranges to be exposed to site-wide sediment. It was agreed that the flowchart would be modified to indicate any calculation of a site-wide EPC in a refined screen would have to consider the scale of the receptor. It was agreed that a new flowchart (and possible new Problem Formulation language) would be produced to reflect this, which according to the comment was never done. A misunderstanding in this area could have real implications for the DRAFT RI report.

Issue #22, Study Area Boundary: According to the resolution process indicated here, "site-wide risk scenarios would be developed for the Study Area from RM 2 to 11.8 and separate EPCs and baseline risk evaluations would be prepared for the areas between RM 1 and RM2, upper Multnomah Channel, and RM 11.8 to RM 12.2". A table should be presented such that it is understood which samples fall into these categories. Of particular concern are the Round 3 composited bass samples, and where they fall in this division. For example, bass samples were composited off OSM at RM2.4, but the GPS location for this composite is listed below 2 (at about 1.7). Clarity on dataset distinctions is needed before report submittal.

Issue #31, Use of the FPM to set SQVs: This comment should be considered “unresolved” as the important details needed for agreement on the use of this methodology have not been worked out. Which version of the model will be used? Will TPH and PAHs both be included? How will acceptable false positive / false negative error rates be balanced? Will the FPM values be produced for each test and each endpoint? This also applies to issue 32 on application of the reference envelop approach. Have we exchanged enough details on the process that we know we are in agreement? How, specifically, are we defining toxicity using this approach?

Issue #38, Breast Milk Feeding Scenario: EPA & LWG did agree that the breast milk feeding scenario will not be included in the HHRA at this time, but how & when will it be included in the risk assessment process?

Issues #46, 47, & 48, Indicator Chemicals: Eric, LWG references a 7/21/08 e-mail from you to LWG in these 3 issues. I can't seem to find it. Would you please forward me that e-mail?

Issue #51, CSM: DEQ understood that in the cited 12/9/08 meeting we agreed that one of the main purposes of the CSM was (to the best of our ability) to provide an understanding of how sediment contamination was generated..., i.e., how did the existing sediment contamination get there? DEQ also understood one of the most important related outstanding CSM issues was how the RI report should present the relative magnitude of historic & current sources & the individual contaminant transport pathways. During the 12/9 meeting we discussed how the LWG could use the individual pathway priority described in DEQ's Milestone Reports for individual sites & how the LWG could work with DEQ to tease out the COI driving that pathway prioritization.

Issue #55, Data Reduction Rules: Is this resolution correct? It is unclear how comments on these rules were resolved, but comments were provided on their approach. Jennifer provided comments on July 21, 2008 (see attachment to this e-mail). The biggest issue for the eco risk is in assuming that an analyte is present if it is detected at least once in any media listed (TZW, surface water, sediment and tissue), and then applying a ½ detection limit to every other sample in other media. Determinations of the presence of an analyte should be media specific, and spatially distinct, which would also be consistent with the HH methodology (“for all media, if an analyte is detected at least once in the study area for a given medium, it is considered present in that medium”).

Issue #8, Application of the WOE Framework: It is unclear how this issue is being resolved, but is important for the risk assessment to have an agreed upon approach before submittal.

Jim Anderson  
Manager, DEQ Portland Harbor Section  
ph: 503.229.6825  
fax: 503.229.6899  
cell: 971.563.1434